

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
1300 I. Street, N.W., Suite 900  
Washington, D.C. 20005  
Telephone: 202-538-8000  
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)  
jonathantse@quinnemanuel.com  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)  
jomairecrawford@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF GOOGLE'S  
ADMINISTRATIVE MOTION TO SEAL  
PLAINTIFFS' PROPOSED ORDERS TO  
AUGUST 2, 2021 JOINT SUBMISSION**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s  
7 Administrative Motion to Seal portions of the Plaintiffs’ Proposed Order re Custodian and Search  
8 Terms and Plaintiffs’ Proposed Order re Sundar Pichai Production that are filed with the  
9 corresponding August 2, 2021 Joint Submission In Response to Dkt. 191, 191-1 Re: Status of  
10 Discovery Disputes. In making this request, Google has carefully considered the relevant legal  
11 standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this request  
12 with the good faith belief that the information sought to be sealed consists of Google’s confidential  
13 and proprietary information and that public disclosure could cause competitive harm.

14 3. Google respectfully requests that the Court seal the redacted portions of Plaintiffs’  
15 Proposed Order re Custodian and Search Terms, attached hereto as Exhibit A, and Plaintiffs’  
16 Proposed Order re Sundar Pichai Production, attached hereto as Exhibit C.

17 4. The information requested to be sealed contains Google’s highly confidential and  
18 proprietary information regarding highly sensitive features of Google’s internal systems and  
19 operations, including details related to cookies, internal identifiers and projects, and various data  
20 logs maintained by Google, that Google maintains as confidential in the ordinary course of its  
21 business and is not generally known to the public or Google’s competitors.

22 5. Such confidential and proprietary information reveals Google’s internal strategies,  
23 system designs, and business practices for operating and maintaining many of its important services,  
24 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-  
25 3.

26 6. Public disclosure of such confidential and proprietary information could affect  
27 Google’s competitive standing as competitors may alter their internal identifier and cookie system  
28 designs and practices relating to competing products. It may also place Google at an increased risk

1 of cyber security threats, as third parties may seek to use the information to compromise Google's  
2 internal data logs, identifier system and projects, and practices.

3 7. For these reasons, Google respectfully requests that the Court order Plaintiffs'  
4 Proposed Order re Custodian and Search Terms and Plaintiffs' Proposed Order re Sundar Pichai  
5 Production to be filed under seal.

6 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
7 and correct. Executed in San Francisco, California on August 2, 2021.

8  
9 DATED: August 2, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

10  
11  
12 By /s/ Jonathan Tse  
Jonathan Tse

13  
14 *Attorney for Defendant*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28